## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEBRASKA

RYSTA LEONA SUSMAN, both	)
individually and as Legal Guardian of	)
SHANE ALLEN LOVELAND, et al.,	)
	)
Plaintiffs,	)
	) Case No. 8:18-cv-00127
V.	)
	)
THE GOODYEAR TIRE & RUBBER	)
COMPANY,	)
	)
Defendant.	)

## INDEX IN SUPPORT OF THE GOODYEAR TIRE & RUBBER COMPANY'S MEMORANDUM IN SUPPORT OF ITS MOTION TO PRECLUDE PLAINTIFFS' PURPORTED TIRE FAILURE EXPERT, DAVID SOUTHWELL, FROM OFFERING OPINIONS FIRST DISCLOSED IN HIS MARCH 4, 2020 SECOND SUPPLEMENTAL EXPERT REPORT AT TRIAL

The Goodyear Tire & Rubber Company ("Goodyear") hereby submits its Index in Support of The Goodyear Tire & Rubber Company's Memorandum in Support of Its Motion to Preclude Plaintiffs' Purported Tire Failure Expert, David Southwell, From Offering Opinions First Disclosed in His March 4, 2020 Second Supplemental Expert Report at Trial.

Exhibit	Description
A	David Southwell's March 4, 2020 Second Supplemental Expert Report
В	The Goodyear Tire & Rubber Company's Objections and Responses to Plaintiffs' First Requests for Production of documents served August 27, 2018
С	Exemplar page from 751-page spreadsheet produced by Goodyear on August 27, 2018
D	The Goodyear Tire & Rubber Company's Objections and Responses to Plaintiffs' Second Requests for Production of documents served March 11, 2019
Е	Mr. Bott's June 27, 2019 cover letter and an exemplar page from the spreadsheet
F	David Southwell's March 28, 2019, deposition in this <i>Susman</i> matter, selected portions, pages 29-30, 53, 111-115
G	Declaration of Clark W. Hedger in Support of The Goodyear Tire & Rubber Company's Memorandum in Support of Its Motion to Preclude Plaintiffs' Purported

Tire Failure Expert, David Southwell, From Offering Opinions First Disclosed in His March 4, 2020 Second Supplemental Expert Report at Trial

Dated: March 6, 2020 GREENSFELDER, HEMKER & GALE, P.C.

By: /s/ Edward S. Bott., Jr.
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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of the foregoing was filed with the Clerk of the Court using the CM/ECF system and served to counsel listed below by electronic mail/shared file site this  $6^{th}$  day of March, 2020, to:

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